

**BINDER & SCHWARTZ LLP**

Eric B. Fisher  
Lindsay A. Bush  
Tessa B. Harvey  
366 Madison Avenue, 6th Floor  
New York, New York 10017  
Telephone: (212) 510-7008

*Attorneys for Khronos LLC*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

-against-

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

-----X  
In re:

BERNARD L. MADOFF,

Debtor.  
-----X

**NOTICE OF TELEPHONIC HEARING ON MOTION OF KHRONOS LLC  
TO QUASH THE TRUSTEE'S FED. R. BANKR. P. 2004 SUBPOENA**

**PLEASE TAKE NOTICE** that on September 9, 2020, at 10:00 a.m., a telephonic hearing (the "Hearing") will be held before the Honorable Stuart M. Bernstein, United States Bankruptcy Judge for the United States Bankruptcy Court, Southern District of New York, on the motion (the "Motion") of Khronos LLC ("Khronos") for an order, substantially in the form of the order attached to the Motion as Exhibit A, quashing the subpoena issued by Irving H. Picard,

trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.*

**PLEASE TAKE FURTHER NOTICE** that pursuant to the Court's General Order M-543, *In re: Coronavirus/COVID-19 Pandemic, Court Operations Under the Exigent Circumstances Created by COVID-19*, dated March 20, 2020, all hearings will be conducted telephonically pending further Order of the Court. All parties who wish to participate in the Hearing must refer to Judge Bernstein's guidelines for telephonic appearances and are required to make arrangements to appear telephonically with Court Solutions LLC at <https://www.courtsolutions.com/> no later than 12:00 p.m. (Eastern Time) one business day before the Hearing. Further instructions regarding telephonic appearances via Court Solutions can be found on the Court's website at <http://www.nysb.uscourts.gov/news/general-order-m-543-court-operationsunder-exigent-circumstances-created-covid-19>. Pro se parties may participate telephonically in hearings free of charge.

**PLEASE TAKE FURTHER NOTICE** that objections or answering papers to the Motion, if any, shall be in writing, shall conform to the requirements of the Bankruptcy Code, Bankruptcy Rules, and the Local Rules of this Court, and shall be filed with the Clerk of the Bankruptcy Court electronically in accordance with General Order M-399 (which can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov)) by registered users of the Bankruptcy Court's filing system, with a courtesy copy delivered to the Chambers of the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, and a copy served upon Binder & Schwartz LLP, 366 Madison Avenue, 6th Floor, New York, NY 10017, Attn: Eric B. Fisher, [efisher@binderschwartz.com](mailto:efisher@binderschwartz.com), on or before September 1, 2020.

Dated: New York, New York  
August 18, 2020

Respectfully submitted,

**BINDER & SCHWARTZ LLP**

/s/ Eric B. Fisher

Eric B. Fisher

Lindsay A. Bush

Tessa B. Harvey

366 Madison Avenue, 6th Floor

New York, New York 10017

Tel: (212) 510-7008

*Attorneys for Khronos LLC*